

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Facilitating the Deployment of Text-to-911 and	)	PS Docket No. 11-153
Other Next Generation 911 Applications	)	
	)	
Framework for Next Generation 911	)	PS Docket No. 10-255
Deployment	)	

**REPLY COMMENTS OF  
RURAL/METRO CORPORATION**

Rural/Metro Corporation (“Rural/Metro”) respectfully submits the following comments in response to the Commission’s Further Notice of Proposed Rulemaking (“NPRM”) regarding the adoption of text-to-911 capabilities.<sup>1</sup> As a provider of emergency dispatch services nationwide, Rural/Metro applauds the Commission’s efforts to ensure that the nation’s 911 system is keeping pace with new technology and consumer expectations. Rural/Metro is concerned, however, that providing flexibility to primary public safety answering points (“PSAPs”) in the adoption of text-to-911 systems could place significant burdens on the secondary PSAPs and dispatch centers that serve them, many of which may be required to interoperate with multiple different text-to-911 systems adopted by primary PSAPs. Rural/Metro therefore urges the Commission to carefully weigh the value of flexibility against the need for reliable interoperation and the potential for significant burdens on secondary PSAPs.

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<sup>1</sup> *Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications*, PS Docket No. 11-153, *Framework for Next Generation 911 Deployment*, PS Docket No. 10-255, Notice of Proposed Rulemaking, FCC 12-149 (rel. Sep. 22, 2011) (“NG911 NPRM”).

## **I. INTRODUCTION**

Rural/Metro is the nation's second largest privately-owned provider of emergency medical services ("EMS"). It is a recognized leader in 911 emergency ambulance services and the trusted provider to some of the largest metropolitan and suburban communities in the nation, including Santa Clara County, CA; San Diego, CA; Denver, CO; Atlanta, GA; Seattle, WA; and Phoenix, AZ. Through its subsidiaries, Rural/Metro provides emergency and non-emergency ambulance transportation to more than 90 city and county EMS systems, serving approximately 700 communities in 21 states. Each year, Rural/Metro provides ambulance services to approximately 1.5 million patients.

Rural/Metro supports these emergency and non-emergency transport operations through a nationwide network of secondary PSAPs and dispatch centers. Primary PSAPs initially receive 9-1-1 calls, but often transfer calls to secondary PSAPs or dispatch centers when the primary PSAP does not dispatch the relevant services, such as fire or emergency medical services, directly from that location.<sup>1</sup> Many of Rural/Metro's operations contract with multiple or secondary PSAPs to provide the actual dispatch and direction of emergency medical services and transport. Such an arrangement maximizes the capabilities of PSAPs and ensures efficient provision of emergency services to large areas. However, it also requires that secondary PSAPs and dispatch centers be able to interoperate with multiple primary PSAPs. Furthermore, even in those cases where a dispatch center only serves a single PSAP, providing flexibility in the adoption of text-to-911 systems could still require companies such as Rural/Metro to implement multiple different text-to-911 systems throughout the country.

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<sup>1</sup> See e.g. WTB Announces Updates and Enhancements to FCC's Master PSAP Registry, Public Notice, DA 04-225 at 1 n.4 (rel. July 23, 2004).

## **II. THE COMMISSION SHOULD CAREFULLY WEIGH THE VALUE OF FLEXIBILITY IN TEXT-TO-911 IMPLEMENTATION AGAINST THE INCREASED BURDEN ON SECONDARY PSAPS**

Recognizing that “the Commission must take the disparate capabilities of PSAPs into account,” the NPRM proposed a set of text-to-911 options that will provide “non-NG911-capable PSAPs with the flexibility to handle text messages in the near term without requiring PSAPs to fund significant upfront investments or upgrades.”<sup>2</sup> The Commission’s concern for the flexibility and infrastructure burdens on PSAPs is commendable, but Rural/Metro notes that were primary PSAPs to take advantage of this flexibility to adopt differing text-to-911 approaches, the secondary PSAPs and dispatch centers serving them could be burdened with the need to accommodate all of the options chosen by served primary PSAPs. In effect, the increased flexibility for primary PSAPs is borne directly by those entities that must support multiple primary PSAPs and their chosen text-to-911 solutions.

It is likely that many secondary PSAPs and dispatch centers could be required to support all three of the Commission’s proposed options, even as the underlying primary PSAPs benefit from the flexibility to choose a single option that best fits its needs. Several commenters have also noted these concerns. Writing on behalf of small and rural carriers, NCTA – The Rural Broadband Association cautions that “the use of multiple third-party solutions creates additional complexity and interoperability issues [because] PSAPs may choose to interface with different third-party vendors than the solutions selected by the wireless carriers in the area.”<sup>3</sup> The Boulder Regional Emergency Telephone Services Authority (“BRETSA”) urges that the Commission specify a

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<sup>2</sup> *NG911 NPRM*, ¶ 127.

<sup>3</sup> Comments of NCTA – The Rural Broadband Association, Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket Nos. 11-153, 10-255 at 3-4 (Mar. 11, 2013).

single format for text-to-911 “to assure that the taxpayer/ratepayer-finances public safety agencies incur the expense of only one SMS and one Real Time Text messaging system, and Public Safety Answering Point call-takers have only one system to work with.”<sup>4</sup> Indeed, the NPRM proposes not only a single text-to-911 option per PSAP, but “several options...a preferred option and one or more fallback options.”<sup>5</sup> Rural/Metro cautions the Commission that secondary PSAPs and dispatch centers will be required to support the sum total of all of these options, the burdens of which could substantially impact these entities’ ability to provide service.

When primary PSAPs adopt differing technical protocols, the burden increases dramatically on the secondary PSAPs and dispatch centers that accommodate them. The need for differing text-to-911 receiving systems would impose significant technical, financial, and operational burdens on Rural/Metro because it would negate the economies of scale that come from being one of the nation's largest ambulance services. BRETSA concludes that it is simply “not economically or operationally feasible for PSAPs to install software or systems to receive the multitude of messaging systems which could be developed.”<sup>6</sup> In addition, purchasing and supporting differing and potentially duplicative text-to-911 systems would adversely affect Rural/Metro’s investment in leading-edge technology systems, innovative business models, standardized business platforms, and industry best practices. The increased operating costs, decreased investment in upgrades, and lack of operational standardization could result in adverse impacts to public safety response.

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<sup>4</sup> Boulder Regional Emergency Telephone Services Authority, Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket Nos. 11-153, 10-255 at i (March 11, 2013) (“*BRETSA Comments*”).

<sup>5</sup> *Id.*, ¶ 129.

<sup>6</sup> *BRETSA Comments* at 10.

Rural/Metro takes no position on the merits of one text-to-911 option over the others. Each has both merits and complications in their implementation. With regard to the availability of several differing options, however, Rural/Metro notes that the adoption of E911 text telephone (“TTY”) requirements provides an educational analogous case. As with TTY, secondary PSAPs will have the “same responsibilities...to receive transferred [text-to-911] calls as efficiently and effectively as voice calls.”<sup>7</sup> Unlike TTY, secondary PSAPs have the responsibility to accommodate multiple technologies, and must do so without the flexibility to choose the technology best suited to promote economies of scale or effective integrations with Rural/Metro’s existing system design. Although TTY was a single, well-understood system, adoption was complicated by unforeseen technical difficulties that resulted in the Commission granting over 100 temporary waivers of the requirement and widespread adoption being delayed for years while solutions were developed.<sup>8</sup> Rural/Metro cautions the Commission that similar complications should be expected in the implementation of text-to-911, and the impact of these complications will be multiplied for secondary PSAPs.

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<sup>7</sup> *Access for 9-1-1 and Telephone Emergency Services*, FCC Encyclopedia (last accessed Mar. 7, 2013) (available at [www.fcc.gov/encyclopedia/access-9-1-1-and-telephone-emergency-services](http://www.fcc.gov/encyclopedia/access-9-1-1-and-telephone-emergency-services))

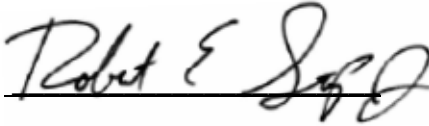
<sup>8</sup> *Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Fourth Report and Order, FCC 00-436 ¶ 2 (rel. Dec. 14, 2000).

#### **IV. CONCLUSION**

For these reasons, Rural/Metro urges the Commission to carefully weigh the benefits of flexibility in text-to-911 implementation against the costs imposed on the secondary PSAPs and dispatch centers that are a critical component of the 911 system.

Respectfully submitted,

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